



February 25, 2014
Via ECFS Filing

Ms. Marlene H. Dortch, Secretary
Office of the Secretary
Federal Communications Commission
9300 East Hampton Drive
Capitol Heights, MD 20743

RE: Radical System Solutions, Inc.
Annual CPNI Certification Filing - CY2013
EB Docket No. 06-36

Dear Ms. Dortch:

Attached for filing is the Calendar Year 2013 Annual CPNI Certification and Statement of Procedures and Compliance as required by 47 C.F.R. Section 64.2009 (e), submitted on behalf of Radical System Solutions, Inc.

Any questions you may have regarding this filing should be directed to my attention at 407-740-3004 or via email to rnorton@tminc.com.

Sincerely,

/s/Robin Norton

Robin Norton
Consultant to Radical System Solutions, Inc.

cc: Don Middleton – Radical (via email)
file: Radical - FCC
tms: FCCx1401

Enclosures
RN/lm

EB Docket 06-36

Date _____

**Statement of CPNI Procedures and Compliance
For 2013
Radical System Solutions, Inc.**

Radical System Solutions, Inc. ("Radical") operates solely as an institutional services provider and as such provides only operator assisted call completion services for transient end users. Therefore, all of our services consist of casual traffic provided outside of any subscribed service relationship, and we do not obtain or retain any CPNI that could be used for marketing purposes.

Our marketing efforts are directed only towards correctional facilities, and such efforts do not include the use of CPNI. Should we expand our business in the future to include the provision of services that involve CPNI, we will follow the applicable rules set forth in 47 CFR Subpart U, including, if necessary, the institution of operational procedures to ensure that notification is provided and customer approval is obtained before CPNI is used or disclosed, that it implements authentication procedures that do not require the use of readily available biographical information or account information, that it notifies customers of account changes, and informs law enforcement in the event of a breach of customer CPNI.

Processes are in place to safeguard call detail information from improper use or disclosure by employees; and to discover and protect against attempts by third parties to gain unauthorized access to these records. We prohibit employees from releasing call detail information during customer-initiated telephone contact. If a caller requests call detail information on a prepaid account, a separate call is placed to the phone number of record before the information is provided. All data is firewall and password protected. Only authorized personnel have access to account data.

We do not disclose call detail on line to end users under any circumstances. Call detail is always required to be made available to correctional facility management personnel, who control their own access to it.

As an institutional services provider, we do not have any retail locations and therefore do not disclose CPNI in-store.

We do not initiate or allow changes to any prepaid account. In the event that an account holder notifies us of a change in information associated with the account, the remaining balance is refunded to the same credit card, and a new account must be opened.

We have procedures in place to notify law enforcement in the event of a breach of the call detail records. We have not had any such breaches during 2013, but we have a process in place to maintain records of any breaches discovered and notifications made to the US Secret Service and the FBI.

We have not taken any actions against data brokers in the last year.

We did not receive any customer complaints about the unauthorized release of CPNI or the unauthorized disclosure of CPNI in calendar year 2013.

We have not developed any information with respect to the processes pretexters may use to attempt to access CPNI.